

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

VANDERSTOK, et al.

Plaintiffs,

V.

GARLAND, et al.

Defendants.

Case No. 4:22-cv-00691

CERTIFICATION OF ADMINISTRATIVE RECORD

I, Andrew Lange, pursuant to 28 U.S.C. § 1746, declares and says as follows: I am currently the Division Chief, Office of Regulatory Affairs, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). The Office of Regulatory Affairs serves as ATF's official point of contact for all matters relating to the creation and/or changes to ATF's regulations and rulings, and serves as the official liaison to the Department of Justice on all rulemaking projects. The information in this certification are based upon my personal knowledge or on information provided to me in the course of my official duties.

The materials listed in the index below, to the best of my knowledge, are a true and complete copy of the administrative record, filed traditionally because of its size, in the above referenced civil action.

INDEX TO THE ADMINISTRATIVE RECORD

1. Chief Counsel Opinion 21208, dated 3/1/71
2. Chief Counsel Opinion 22334, dated 1/24/77
3. ATF Classification Letters
4. Firearms Technology Branch (FTB) Tech Bulletin 14-0, dated 10/28/13
5. FTB Tech Bulletin 14-0, dated 11/1/13
6. AR Type Firearm Visual Reference Guide
7. Receiver Blanks Talking Points and Qs & As, dated 4/9/14
8. Shawn Nelson, “Unfinished Lower Receivers,” Prosecuting Firearms Offenses, Nov. 2015
9. United States v. Jimenez, 191 F. Supp. 3d 1038 (N.D. Cal. 2016)
10. Letter from then Attorney General Loretta Lynch to then Speaker of the House Paul Ryan, dated 9/8/16 re: U.S. v. Jimenez with opinion attached.
11. H.R. Rep. No. 116-88 (May 28, 2019) “Homeland Security Assessment of Terrorists’ Use of Ghost Guns Act”
12. United States v. Rowold, 429 F. Supp. 3d 469 (N.D. Ohio 2019)
13. Letter from Members of Congress to then ATF Acting Director Regina Lombardo, dated 4/23/20
14. Excerpts from ATF’s website:
 - “Are there restrictions on who can purchase receiver blanks?”
 - “Are ‘80%’ or ‘unfinished’ receivers illegal?”
 - “Does an individual need a license to make a firearm for personal use?”
 - “What is ATF doing in regard to people making their own firearms?”

15. Memo to all United States Attorneys from Executive Office of United States Attorneys dated 7/20/20 re: Prosecutions Involving Firearms Frames and Receivers
16. Memo to ATF Acting Director from ATF Chief Counsel dated 12/4/20 re: Classification of Polymer80 “Buy Build Shoot” Kits
17. Letter from Senators to President Biden, dated 2/18/21
18. Letter from Senators to President Biden, dated 3/9/21
19. Polymer80 PF940C Pistol Frames, 80% Instructions
20. Letter from Everytown For Gun Safety to Attorney General Merrick Garland, dated 3/16/21
21. Email dated 3/16/21: Firearm Manufacturers Meeting Request
22. Letter from State Attorneys General to Attorney General Garland, dated 3/22/21
23. Email dated 3/23/21: Firearm Manufacturers Meeting
24. Notes from Firearm Manufacturers Meeting, dated 3/26/21
25. Wall St. Journal: “Ghost-gun concerns prompt feds to meet with firearms makers,” dated 3/26/21
26. Application for a Search Warrant, case number 3:20-mj-123-WGC (D. Nev.), filed 12/9/20
27. ATF Office of Strategic Intelligence and Information (OSII), Criminal Intelligence Division, “Self-Made Unserialized Firearm Developments,” dated 9/24/19
28. Homeland Security Intelligence Assessment, dated 4/22/19
29. Joint Intelligence Bulletin, “Ghost Guns Challenge Law Enforcement,” dated 1/11/19
30. ATF, OSII, “Increased Possession of Privately Made Firearms (PMFs) by Prohibited Persons,” dated 12/15/20

31. Baltimore Sun: “Baltimore police report a 400% increase in untraceable ‘ghost guns,’ as legislators consider action,” dated 2/18/21
32. Email dated 3/30/17 FW: Firearms Ruling
33. Email dated 10/1/20 RE: seeing the various types of silence[r]s with attachment:
General Silencer Information
34. Email 11/30/20 RE: percentage of electronic storage of Form 4473
35. Email 12/15/20 RE: markings on silencers, existing ones
36. Email 12/15/20 RE: Form 4473 storage
37. Email 12/15/20 RE: new Definition of Receiver: Number historically produced
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42. Email 3/1/21 RE: Silencer costs
43. Email 3/2/21 RE: 20 Year + firearms traces
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46. Explanations of data – PMFs or Ghost Guns dated 3/4/21
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determination with photos
48. Email 3/16/21 RE: Number of companies that sell silencers
49. Email 3/17/21 RE: New Def Rec: silencers
50. Email 3/23/21 RE: Individual Purchases of Silencers

51. Email 3/24/21 Business Use of Serial Numbers
52. Email 4/1/21 FW: Shipping records to ATF
53. Email 4/2/21 RE: Shipping records to ATF
54. Fact Sheet: Biden-Harris Administration Announces Initial Actions to Address the Gun Violence Public Health Epidemic, dated 4/7/21
55. Email 4/20/21 FW: PMFs 3D printed in Spain
56. Email 4/29/21 FW: PMFs successfully traced with attachments: Completed Personally Made Firearms Traces, Calendar Year 2016-2020 and PMF Successful Traces
57. Email 4/30/21 RE: 20 year + firearms traces with attachment: Trace Completion Codes and 20 Year Traces
58. ATF, OSII, Criminal Intelligence Division: Completed Personally Made Firearms Traces, Calendar Year 2016 – 2020
59. Science News: “3-D printed ‘ghost guns’ pose new challenges for crime scene investigators,” dated 9/24/19
60. Los Angeles Times: “5 dead in Santa Monica rampage, gunman acted alone, police say,” dated 6/7/13
61. The Washington Post: “District seeks to ban ‘ghost gun’ kits as seizures of homemade weapons soar”
62. Los Angeles Times: “LA gangs stockpile untraceable ‘ghost guns’ that members make themselves,” dated 7/6/18

63. New York Attorney General's Press Release: "AG Schneiderman Announces 11 Year Jail Sentence of Defendant Convicted for Illegally Trafficking Untraceable 'Ghost Guns,'" dated 4/28/16.
64. San Francisco Chronicle: "'Ghost guns' present a challenge to public safety," dated 3/10/20
65. Time: "The Saugus High School Shooter Used an Illegal 'Ghost Gun,'" dated 11/23/19
66. The Trace: "ATF is Shutting Down Businesses It Says Are Hawking Silencers Disguised as Cleaning Tools," dated 5/12/17
67. Center for American Progress: "The Gun Industry in America," dated 8/6/20
68. ATF Report of Active Firearms Licenses, dated 1/11/21
69. New Definition of Firearm Frame or Receiver summary
70. Small Arms Survey: "Issue Brief," No. 17, March 2016
71. Jurgen Brauer, "The U.S. Firearms Industry: Production and Supply," 2013
72. Small Arms Survey: Annual Report 2018
73. Matt Schroeder, Small Arms Survey, "On the Record: Illicit Weapons in the United States," 2014
74. OneStop Reports
75. AP News: "Design of AR-15 could derail charges tied to popular rifle," dated 1/13/20
76. U.S. Bureau of Labor Statistics (BLS), Occupational Employment and Wages, May 2019: Mechanical Engineers
77. Pages from websites:

80% Lowers
JSD Supply

- 80% Arms
 - MDX Arms
 - Ghost Guns
 - Defense Distributed
 - American Weapons Components
 - 80-Lower.com
78. BLS Occupational Employment and Wages, May 2019: Forging Machine Setters, Operators, and Tenders, Metal and Plastic
79. BLS Occupational Employment and Wages, May 2019: Cutting, Punching and Press Machine Setters, Operators and Tenders, Metal and Plastic
80. Amazon pages re: steel metal stamps
81. Google shopping pages re: stamping tools
82. BLS Occupational Employment and Wages, May 2019: Cashiers
83. Pages from websites:
- VelocityWorks
 - Las Vegas Laser Engraving
 - Engrave It Houston
 - Tar Heel State Firearms
84. Regulatory Analysis Research Tables
85. Definition of Frame or Receiver and Identification of Firearms, Preliminary Regulatory Analysis and Initial Regulatory Flexibility Analysis, April 2021
86. Notice of Proposed Rulemaking: Definition of “Frame or Receiver” and Identification of Firearms, dated 5/21/21
87. Link to comments: www.regulations.gov/docket/ATF-2021-0001/comments
88. Comment matrix
89. Form Letters: full comment language

90. Powerpoint: “ATF’s Notice of Proposed Rulemaking (NPRM) Clarifying ‘Frame or Receiver’ Definition”
91. Comments spreadsheets
92. Email 7/23/21 FW: refinishing Engravings on firearms
93. Email 9/9/21 RE: Economic comments: Definition of Receiver
94. Email 9/10/21 RE: gunsmithing expertise requested with FFL licensing requirements
95. Email 10/20/21 RE: recent experience as a gunsmith requested
96. Email 10/20/21 RE: gunsmiths engraving PMFs
97. Email 12/21/21 FW: PMF training – case study
98. Email 1/3/22 RE: firearms traces older than 20 years linked to successful prosecution cases
99. Summary of Successful Prosecution Cases
100. Email 1/4/22 RE: New Def Rec. Serializing PMFs for type 3 Collectors
101. Email 1/6/22 FW: response
102. Excerpt from GAO: Firearms Data: ATF Did Not Always Comply With the Appropriations Act Restriction and Should Better Adhere to Its Policies, June 2016
103. Email 1/10/22 RE: Age of Firearms from Traces older than 20 years with attachment: Firearm Age Breakdown 21-70 years
104. Email 1/10/22 Fwd: [Redacted] Data
105. National Tracing Center: Unsuccessful Crime Gun Traces due to destruction of 20-year records, January 2022
106. Email 1/12/22 RE: Safety Equipment at an FFL
107. Email 1/19/22 FW: Response with attachment: Traces__C3__and [redacted]

108. Email 1/21/22 RE: Update to Table with attachment: 20+ Year Firearms Tracing Stats
109. ATF, OSII, Criminal Intelligence Division: Suspected Privately Made Firearms (PMF) Traces, Calendar Years 2016 through 2021
110. Email 1/25/22 RE: update
111. Email 1/25/22 20+ Year Active Records
112. Email 1/25/22 RE: Follow-up request from ORA
113. Email 1/25/22 RE: Jeff's experience
114. Email 1/26/22 RE: NTC Analysis of 20 year record retention
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117. Email 1/27/22 RE: Type 7 FFL Records Retention Information Request
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119. Email 1/27/22 RE: total cases of Homicide and Violent Crime with attachment: Explanations of data for PMF Analysis Final NPRM
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121. Chart and graph: Total Suspected PMFs by Calendar Year
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123. Email 1/28/22 RE: PMF Overnight Repairs/Customization
124. Email 2/2/22 RE: NFAD Totals
125. Email 2/8/22 RE: Electronic Storage of Form 4473
126. FBI CJIS/NICS Comments to draft Final Rule and ATF Response
127. Excerpt from Science and Engineering of Small Arms

128. Letter from Senators to CEO of YouTube, Inc., dated 2/14/22
129. Email 1/26/22 FW: C3 traces with attachment: C3 Traces 2010+
130. Trace Details PMF with Purchaser Trace Data 1/21/22
131. BLS News Release: Employment Cost Index June 2021
132. BLS News Release: Employment Cost Index March 2021
133. BLS News Release: Employment Cost Index September 2021
134. Australian Institute of Criminology, "Cost benefit analysis and its application to crime prevention and criminal justice research," 2011
135. House of Representatives Joint Economic Committee Testimony: Cost of Firearm Injuries and Deaths, dated 9/18/19
136. RAND: "Effects of Low-Quality Handgun Bans on Violent Crime," 2020
137. RAND: "Effects of Licensing and Permitting Requirements on Violent Crime," April 2020
138. Criminology and Public Policy: "Evidence concerning the regulation of firearms design, sale, and carrying on fatal mass shootings in the United States," 2020
139. RAND: "How Gun Policies Affect Violent Crime," updated April 2020
140. Criminology and Public Policy: "Evidence concerning the regulation of firearms design, sale, and carrying on fatal mass shootings in the United States," 2020 (duplicate)
141. 81 Fed. Reg. 2658, "Machineguns, Destructive Devices and Certain Other Firearms, Background Checks for Responsible Persons of a Trust or Legal Entity with Respect to Making or Transferring a Firearm," 1/15/16

142. Small Arms Survey: “Taking Stock of action on the illicit small arms trade: Measures to address the diversion of small arms,” dated 7/17/20
143. Small Arms Survey: “Implications for the International Tracing Instrument of marking and tracing polymer and modular weapons,” dated 7/7/20
144. Small Arms Survey: “Craft weapons,” dated 6/19/20
145. Small Arms Survey: “National Action Plan as a strategic tool for weapons and ammunition management/small arms control,” dated 6/22/20
146. Small Arms Survey: “The role of regional organizations,” dated 6/23/20
147. Small Arms Survey, Issue Brief, No. 17, March 2016
148. Jurgen Brauer, “The U.S. Firearms Industry: Production and Supply,” 2013
149. Small Arms Survey Annual Report 2018
150. Matt Schroeder, Small Arms Survey, “On the Record: Illicit Weapons in the United States,” 2014
151. Washington State Institute for Public Policy: “What Works and What Does Not?” February 2018
152. OneStop Reports
153. Final costs table
154. Web pages from:
 - SMF Tactical
 - Modulus Arms
 - 80% Lowers
 - 80-Lowers.com
 - AK-Builder.com
 - Get Lowers.com
 - Omega Tactical Distribution
 - 1776SupplyCo.com
 - Ormond Arms

- American Made Tactical
 - Righttobear.com
 - Broken Arms
 - 5D Tactical
 - Venom Defense and Design
 - 80% Arms
 - American Weapons Components
 - 1911 Builders
 - Defense Distributed
 - James Madison Tactical
 - Durkin Tactical
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 - Call to Arms Gun Works
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157. Final Economic Spreadsheets
158. “Definition of ‘Frame or Receiver’ and Identification of Firearms,” Regulatory Impact Analysis and Final Regulatory Flexibility Analysis, April 2022
159. Transcript of Motion Hearing on 9/26/19, United States v. Rowold, 3:18-cr-387 (N.D. Ohio)
160. Chief Counsel Opinion, dated 3/1/71
161. Chief Counsel Opinion, dated 1/24/77

162. Military.com: “Army Picks Sig Sauer’s P320 Handgun to Replace M9 Service Pistol,” dated 1/19/17
163. TaskandPurpose.com: “Every U.S. military branch is about to get its hands on the Army’s new sidearm of choice,” dated 11/18/20
164. AP News: “Design of AR-15 could derail charges tied to popular rifle,” dated 1/13/20
165. Washington Post: “Magruder student bought ‘ghost gun’ components online before wounding classmate, prosecutor says,” dated 1/24/22
166. NBCPhiladelphia.com: “3 Pipes Turned into a Shotgun: Nearly 1-in-10 Guns Seized in Philly Are Homemade,” dated 10/7/21
167. Rockefeller Institute of Government: “Ghost Guns: A Haunting New Reality,” April 2021
168. Los Angeles Times: “LAPD declares ‘ghost guns’ an ‘epidemic’ citing 400% increase in seizures,” dated 10/15/21
169. The New York Times: “‘Ghost Guns’: Firearm Kits Bought Online Fuel Epidemic of Violence,” dated 11/14/21
170. Chicago Tribune: “We’re seeing an explosion,” dated 10/14/21
171. ClickOrlando.com: “Untraceable ‘Ghost Guns’ sold across Central Florida,” dated 11/5/16
172. DOJ Press Release: *Barnstable Man Charged with Firearm Trafficking*, 6/22/21
173. DOJ Press Release: *Big Island man arrested on methamphetamine and firearm charges*, 5/18/21
174. DOJ Press Release: *Bronx Man Who Possessed Five “Ghost Guns” Charged With Possessing A Firearm And Ammunition*, 10/5/21

175. DOJ Press Release: *Brooklyn Felon Sentenced to 48 Months' Imprisonment for Possessing Arsenal of Weapons Including "Ghost Guns,"* 10/12/21
176. DOJ Press Release: *Buffalo Man Arrested, Charged With Manufacturing Ghost Guns,* 8/20/21
177. DOJ Press Release: *Burlington Man Pleads Guilty to Ammunition Charge,* 12/12/18
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179. DOJ Press Release: *Cedar Rapids Man Pleads Guilty to Drug Trafficking and Possessing Machineguns and a Pipe Bomb,* 1/21/20
180. DOJ Press Release: *Colchester Man Sentenced to 34 Months in Federal Prison for Illegally Possessing Machinegun,* 11/12/21
181. DOJ Press Release: *Connecticut Man Sentenced for Firearm Trafficking,* 9/16/21
182. DOJ Press Release: *Convicted Felon Sentenced for Narcotics Trafficking and Manufacturing "Ghost Guns,"* 9/24/21
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186. DOJ Press Release: *Denver Gang Member Sentenced To Over 15 Years In Federal Prison For Making And Selling Dozens Of High Powered Guns, Including Machine Guns And Silencers,* 11/22/19

187. DOJ Press Release: *District Man Sentenced to 10 ½ Years in Prison for Armed Robbery and Earlier Shooting*, 10/13/21
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195. Courant.com: “Gang Task Force accused two East Hartford men of using 3D printers to manufacture and sell hard-to-track ‘ghost guns,’” dated 1/7/22
196. DOJ Press Release: *Hartford Man Charged with Illegally Possessing Firearm and Ammunition*, 7/23/21
197. DOJ Press Release: *Indiana Residents Indicted on Terrorism and Firearms Charges*, 7/11/19
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231. DOJ Press Release: *Vineland Boys Gang Member Sentenced to 31 Years in Federal Prison for Racketeering Conspiracy, Attempted Murder of Rival Gangsters*, 7/22/21
232. CNN: "A Rhode Island man was arrested for allegedly selling 'ghost guns' and trafficking the firearms to the Dominican Republic," dated 1/9/22
233. Armament Research Services (ARES): "Firearms using 3-D printed components seized in Sweden," 5/19/17

- 234. Anu.edu: “Glock ghost guns up for grabs on the dark web,” 3/23/21
- 235. ARES: “Multiple 3D-printed Firearms Seized in Sydney, Australia,” dated 8/11/20
- 236. BBCNews: “Spain dismantles workshop making 3D-printed weapons,” 4/19/21
- 237. The Independent: “Use of 3D printed guns in German synagogue shooting must act as warning to security services, experts say,” October 2019
- 238. Homeland Security Intelligence Assessment, dated 4/22/19
- 239. H.R. Report 116-88, “Homeland Security Assessment of Terrorists’ Use of Ghost Guns Act,” dated 5/28/19
- 240. Joint Intelligence Bulletin, “Ghost Guns Challenge Law Enforcement,” dated 1/11/19
- 241. 3dprintingmedia.network: “Oceanian media report seizures of 3D printed guns, submachine guns,” dated 6/22/21
- 242. ABC7 Chicago: “Al Qaeda launches 1st public campaign in 4 years to encourage lone wolf terrorist attacks,” dated 7/29/21
- 243. Smh.com: “Alleged right-wing extremist charged over blueprint to 3D-print a gun,” dated 9/13/21
- 244. Tucson Sentinel: “CBP: 3-D printed full-auto rifle seized at Lukeville crossing”
- 245. International Centre for Counter-Terrorism: “CTRL, HATE, PRINT: Terrorists and the Appeal of 3D-Printed Weapons,” dated 7/13/21
- 246. DOJ Press Release: *Dark Web Gun Trafficker from Nevada County Pleads Guilty to Unlawful Dealing in Firearms*, dated 6/22/18
- 247. DOJ Press Release: *Fishers Residents Indicted on Terrorism and Firearms charges*, dated 7/12/19

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251. DOJ Press Release: *Mexican National Charged with Possessing Firearms, Methamphetamine in Checked Luggage at MSP Airport*, dated 11/2/21
252. The Independent: Police issue warning over terrorist use of 3D-printed guns as UK neo-Nazi jailed,” dated 6/14/21
253. Nextgov.com: “TSA Confiscated 3D Printed Gun at Raleigh-Durham International Airport”
254. Time: “The TSA Has Found 3D-Printed Guns at Airport Checkpoints 4 Times Since 2016,” dated 8/2/18
255. Al Jazeera Weapons News: “What’s behind far-right trend of using 3D tech to make guns?” dated 7/31/21
256. Wjla.com: “Bill to ban ghost guns passes in Maryland House, heads to Gov. Hogan’s desk,” dated 3/29/22
257. Press Release – Montgomery County Council: Counsel unanimously approves Ghost Guns bill, restricting the sale of transfer of ghost guns to minors, dated 4/6/21
258. Denver Gazette: “Denver outlaws owning manufacturing ‘ghost guns’ in the city,” dated 1/3/22
259. Los Angeles Times: “L.A. City Council votes to ban ‘ghost guns,’” dated 12/1/21

260. CBS8.com: “Mayor Gloria signs ban on ghost guns in San Diego,” dated 1/3/22
261. Mercurynews.com: “Oakland joins growing list of California cities to ban ghost guns,” dated 1/18/22
262. Reason.com: “Philadelphia Becomes First City to Ban 3D-Printed Gun Manufacturing,” 11/22/13
263. ATF Fact Sheet – eTrace: Internet Based Firearms Tracing and Analysis, September 2021
264. Explanations of data: Privately Made Firearms (PMFs) or Ghost Guns, dated 1/21/22
265. ATF, OSII, Criminal Intelligence Division: Suspected Privately Made Firearm (PMF) Traces, Calendar Years 2016 through 2021
266. Excerpt from “Following the Gun: Enforcing Federal Laws Against Firearms Traffickers,” June 2000
267. Inland Empire News: “Deputy recovers ‘ghost gun’ from convicted felon during traffic stop,” dated 8/10/21
268. AP News: “Felon on supervision accused of having ‘ghost gun’ arsenal”
269. SPD Blotter: “Georgetown Arrest of Felon Leads to Recovery of Ghost Gun,” dated 11/8/21
270. LehighValleyLive.com: “Lehigh Valley felon was using 3D printer to make ‘ghost guns’ at home, Pa. attorney general says,” dated 1/29/21
271. NBCPalmSprings.com: “Parolee Arrested With AR-15 Ghost Gunk, Fake Law Enforcement Badge,” dated 8/13/21
272. Excerpt from The National Firearms Act Handbook, April 2009
273. FFL Newsletter May 2012

- 274. FFL Newsletter September 2011
- 275. ATF Ruling 2016-1
- 276. ATF Ruling 2016-2
- 277. Hawkridgesys.com: “How to Insert Internal Components with Markforged Composite 3D Printing”
- 278. 3dprintingindustry.com: “LehVoss Group Leads Innovate UK Project for Overprinting High-Performance Polymers,” 8/25/21
- 279. Markforged.com: “MMF #5: A Guide to Embedding Components in 3D Printed Parts”
- 280. Excerpt from US Attorney’s Manual, Section 9-27.260: Initiating and Declining Charges—Impermissible Considerations
- 281. ATF memo regarding M16 serial numbers, dated 2/2/73
- 282. Letter from Acting Chief, Firearms Technology Industry Services Branch, to Mark Barnes, Esq., dated 3/20/15
- 283. NBC News: “Senators call on YouTube to crack down on ‘ghost gun’ videos,” dated 2/15/22
- 284. NBC News: “YouTube banned ‘ghost gun’ videos. They’re still up.” Dated 1/24/22
- 285. Pennlive.com: “‘Ghost gun’ used in shooting that killed two outside Snyder County restaurant,” dated 7/14/20
- 286. CNN: “The gunman in the Saugus High School shooting used a ‘ghost gun,’ Sheriff says,” 11/21/19
- 287. DOJ Press Release: *Bridgeport Felon Sentenced to More Than 5 Years in Federal Prison for Possessing Firearms*, 1/7/21

288. TimesofSanDiego.com: “Convicted Felon Nabbed in Lakeside with Meth, Ghost Guns and Burglary Tools,” dated 1/29/22
289. KymKemp.com: “Felon Found With ‘Ghost Gun’ Arrested, says HCSO,” dated 11/29/21
290. SPD Blotter: “Georgetown Arrest of Felon Leads to Recovery of Ghost Gun,” dated 11/8/21
291. KIRO 7 News: “‘Ghost guns’: Loophole allows felons to legally buy gun parts online,” dated 2/22/18
292. LehighValleyLive.com: “How the felon killed at Walmart got his handgun, DA says,” dated 5/9/18
293. LehighValleyLive.com: “Lehigh Valley felon was using 3D printer to make ‘ghost guns’ at home, Pa. attorney general says,” dated 1/29/21
294. Boston.com: “Winthrop man had homemade ‘ghost’ guns and 3,000 rounds of ammunition, prosecutors say,” dated 8/5/20
295. ATF Ruling 2009-1
296. Congressional Research Service, “Statutory Federal Gun Registry Prohibitions and ATF Record Retention Requirements,” dated 3/4/22
297. Excerpt from Science and Engineering of Small Arms, 2021
298. Excerpt from Sporting Arms and Ammunition Manufacturers’ Institute Glossary
299. ATF Ruling 2003-1
300. ATF Ruling 2003-2
301. ATF Ruling 2003-3
302. ATF Ruling 2003-4

- 303. ATF: How to Properly Destroy Firearms, dated 8/14/19
- 304. Official Journal of the European Union, Commission Implementing Directive 2019/68 of 1/16/19 establishing technical specifications for the marking of firearms and their essential components
- 305. ATF Ruling 77-1
- 306. ATF Website Q&A: “Does a gunsmith need to enter every firearm received for adjustment or repair into an acquisition and disposition (A&D) record?” Dated 7/13/20
- 307. Memo to Heads of All Department Components from the Attorney General re: Issuance and Use of Guidance Documents by the Department of Justice, dated 7/1/21
- 308. USPS.com: Publication 52 – Hazardous, Restricted and Perishable Mail, section 43: Firearms definitions
- 309. TTB.Gov Q&As: Firearms/Ammunition Excise Tax, Manufacturers and Producers
- 310. Revenue Ruling 61-189
- 311. Office of Management and Budget Circular A-4, dated 9/17/03, to the Heads of Executive Agencies and Establishments re: Regulatory Analysis
- 312. ATF Website: Rulings, dated 10/20/21
- 313. Office of Justice Programs, Bureau of Justice Statistics: “Source and Use of Firearms Involved in Crimes: Survey of Prison Inmates, 2016,” January 2019
- 314. ATF: “Highlights of Definition of ‘Frame or Receiver’ and Identification of Firearms Final Rule

315. Memo from then Acting ATF Director Marvin Richardson to Attorney General Garland re: Final Rule concerning the definition of ‘frame or receiver’ and identification of firearms

316. 87 Fed. Reg. 24652 (4/26/22), “Definition of ‘Frame or Receiver’ and Identification of Firearms

I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 24th day of October, 2022.

Andrew Lange
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